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ASSOCIATE
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Hon. Nelson S. Roman, U.S.D.J.
United States District Court, S.D.N.Y
United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

Re: United States v. Jermaine Hughley
17 Cr. 644(NSR) - 10

February 2, 2020

Pre-Motion Conf. scheduled for
Feb. 14, 2020 at 12:30pm. Clerk
of the Court requested to terminate
the motion (Doc. 193).

Dated: Feb. 10, 2020

SO ORDERED:

[Signature]
HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Dear Judge Roman:

As ordered by the Court on January 31, 2020 during Mr. Hughley's status conference, I write to submit a motion to the Court on his behalf regarding his request for new counsel. His letter to the Court has been attached as **Exhibit A**.

The issues to be decided revolve around whether or not Jermaine Hughley has any viable motions to file on his behalf. My client would like me to move to suppress his arrest. I explained to him there is no such thing as suppressing an arrest. Mr. Hughley made no statements at the time of his arrest; nothing was recovered from him at the time of his arrest; there are no identification issues in the case as it relates to Jermaine Hughley; and there are no Expert or scientific issues to resolve. I am not moving for severance because I think it is in his interest to be tried with his co-defendants should they decide to go to trial. There might be a 404(b) motion before trial but we are not at that place yet.

I think this is just a misunderstanding of the process and perhaps the Court can explain to Mr. Hughley that under these facts there are no motions to be made. Not every defendant makes motions. You need facts to support motions.

In any event, perhaps it would be prudent to set a court date to resolve these issues. I have been involved with the case since its inception and am familiar with all of the issues that need to be addressed before trial.

I have discussed all of this with my client, who I have always had a good relationship with, several days before the January 31, 2019 status conference. There was no mention at that time of his intentions to request new counsel so I was very surprised when he handed me the attached document in Court without prior notice. Jermaine Hughley is understandably frightened about going forward as anyone would be with these serious charges. I am prepared to do whatever the Court suggests.

Respectfully,

s/s
Allan P. Haber

APH: fms
cc: Bruce Koffsky, Esq.
Jacob Barclay Mitchell, Esq.

TRULINCS 79848054 - HUGHLEY, JERMAINE - Unit: BRO-G-B

FROM: 79848054
TO:
SUBJECT: Letter To Court
DATE: 01/30/2020 10:26:23 AM

To: Honorable Stephen Nelson, U.S.D.J.
From: Jermaine Hughley Reg. # 79848-054
Re: Case No. 17-CR-00644 (NSR)

Date: January 30, 2020

Your Honor:

First and foremost I'd like to thank you for your time--understandably, you are very busy, so I'll be sure to be brief. With that said, I'd like for you to know that the reason for me writing you is that I desperately need this Court's help; specifically, I need for this Court to hold off moving forward in these proceedings until I'm made to fully understand all that is taking place here.

The underlying issue here is that because I do not fully "understand" all that is taking place here, I am unable to make any decisions about things like how I wish to proceed: That is because any decisions in this matter must be knowingly, willingly, and intelligently based--something that can not happen if I lack an adequate understanding of those things required by me.

For the time being all that I understand is that I have an obligation / duty to put this Court on Notice of the fact that I do not fully understand all that is taking place here. Please be aware that I'm well aware that if I do not know what my rights are, then I have no rights at all; and, that fortunately, I happen to be aware that I have rights. And that is why I'm writing this Court (because the first step to solving a problem is identifying what the problem is).

Not fully understanding all that is taking place here is not my only concern though: I also have issues with my current legal representation that I'd like to bring to this Court's attention. These things will take time for me to do though, and I'm currently working on filing something with this Court soon to address these things. For now, I just felt that, especially being that I have Court tomorrow, I should be sure to put this Court on Notice that I'm unable to make any decision on how to proceed, and, that I will be filing something with this Court soon to further expound upon the underlying issues here.

Right now, I'm simply and humbly, asking this Court to please hold off proceeding forward in this matter, and or from requiring me to make any decisions here, until I'm given a full and fair opportunity to be heard regarding my concerns listed herein, and, this Court does what is necessary to relieve me of the prejudices suffered by my current lack of understanding.

Once again, I'd like to thank this Court for its time. If there are any questions or concerns, please feel free to contact me any time. Have a wonderful day.

Respectfully Submitted,

Jermaine Hughley 79848-054
MDC - Brooklyn
P. O. Box 329002
Brooklyn, NY 11232

